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The Honorable Ramon E Reyes, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York

January 26, 2021

Honorable Sir:

Re: The H Roller Group LLC
v C&S Global Inc, et al
1:20-cv-05268

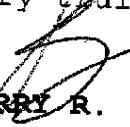
I am a defendant in the case referenced above and write to request a pre motion conference pursuant to the Court's Individual Practice Rule III(B). Codefendants are represented by separate counsel.

The motion contemplated is to vacate my default in answering the complaint, which the affidavit of service on file indicates was served on me by nail and mail, at the address from which I moved. During the three month removal period, the premises was usually closed and the metal gate lowered. I was not served and did not receive the Summons and Complaint.

It appears that the gravamen of the complaint, as to me, is that funds were deposited by plaintiff in my escrow account in connection with a commercial transaction. The complaint alleges that codefendants induced the plaintiff to deposit the funds through economic duress and fraud. Plaintiff then goes on to claim that I released the escrowed funds without authority to do so. I deny the foregoing and wish to interpose the appropriate answer and request that the default judgment sought by plaintiff not be entered.

Thank you in advance for your consideration of this request.

Very truly yours,


BARRY R. FEERST